

REMARKS

Reconsideration and allowance of the subject application in view of the following remarks is respectfully requested.

Claims 1, 3-5, 7-14, and 16-23 are pending in the application. The claims remain unchanged notwithstanding the Examiner's new art rejections which are respectfully traversed for at least the following reasons.

1. Indication of allowable subject matter of claim 23 in the absence of art rejections is believed appropriate and therefore respectfully requested.

2. The *35 U.S.C. 103(a)* rejection relying primarily on *Yamada* (JP 2007 336766) is improper, because *Yamada* is not prior art to the present invention. In particular, both the JP publication date (December 27, 2007) and the JP filing date (June 19, 2006) of *Yamada* postdate the US filing date of the instant application (March 9, 2006). Therefore, *Yamada* does not qualify as prior art under any provisions of *35 U.S.C. 102*.

Withdrawal of the art rejections relying on *Yamada* is believed appropriate and therefore respectfully requested.

3. The *35 U.S.C. 102(b)* rejection of claims 1, 3-5, 7-14, and 16-22 as being anticipated by *Kanehara* (JP 2001 069762) is respectfully traversed, because the applied reference fails to teach or disclose each and every element of the rejected claims.

As to **independent claim 1**, the applied reference does not fairly teach or disclose “a capacitor and a resistor connected in series between a neutral point of the alternating current load and a reference potential point...”

Kanehara discloses a star-connection of capacitors Cbu, Cbv, Cbw and resistors Rbu, Rbv, Rbw to nodes U1, V1, W1 between a common mode choke Lc and an electric apparatus 101. The star connection is connected, however, not to the neutral point of the electric apparatus 101. A person of ordinary skill in the art would understand that the neutral point of the electric apparatus 101 is the point from which IM flows and which is grounded as best seen in all illustrated embodiments of *Kanehara*. Any neutral point (e.g., B or L) on the power source side of electric apparatus 101 is a neutral point of the power source of electric apparatus 101, rather than a neutral point of electric apparatus 101 itself.

Therefore, Applicants respectfully submit that *Kanehara* fails to anticipate the invention of claim 1, as well as the respective dependent claim(s).

As to **independent claim 5**, the applied reference does not fairly teach or disclose “a capacitor and a resistor connected in series between a neutral point of the alternating current load and the reference potential point” as discussed with respect to claim 1 *supra*.

The applied reference also fails to teach or disclose “a common mode choke connected to the alternating current input of the power converter.”

In most of the illustrated embodiments of *Kanehara*, common mode choke Lc is connected to the DC output side of the inverter 100. The illustrated embodiments most relevant to the claim feature at issue appear to be FIGs. 32-34 of *Kanehara* where three coils are connected between AC

power source 102 and an inverter. However, such three coils are not disclosed to define a common mode choke. Further, the embodiments illustrated in FIGs. 32-34 of *Kanehara* all lack the claimed resistors.

Should the Examiner believe that *Kanehara* includes more relevant teachings in its textual description, the Examiner is requested to furnish an accurate English translation of such teachings.

Until and unless proved otherwise, Applicants respectfully submit that *Kanehara* fails to anticipate the invention of claim 5, as well as the respective dependent claim(s).

As to **independent claim 8**, the applied reference does not fairly teach or disclose “a connecting element that connects the neutral point of the alternating current load to a reference potential point” as discussed with respect to claim 1 *supra*.

The applied reference also fails to teach or disclose “a common mode choke connected to said direct current input of the power converter.”

In all illustrated embodiments of *Kanehara*, common mode choke Lc, if provided, is connected to the alternating current output of inverter 100. In the illustrated embodiments of FIGs. 32-34, if the three coils on the input side of the inverter were considered to define a common mode choke, such “common mode choke” would be connected to the alternating current input of the inverter.

The applied reference further fails to teach or disclose “a reference potential point having little potential variation at a direct current power source side of the common mode choke.”

In all illustrated embodiments of *Kanehara*, any common mode choke Lc, if provided, is connected to an alternating current power source, be it the AC source 102 or the inverter 100.

Should the Examiner believe that *Kanehara* includes more relevant teachings in its textual description, the Examiner is requested to furnish an accurate English translation of such teachings.

Until and unless proved otherwise, Applicants respectfully submit that *Kanehara* fails to anticipate the invention of claim 8, as well as the respective dependent claim(s).

As to **independent claim 11**, the applied reference does not fairly teach or disclose “a connecting element that connects a neutral point of the alternating current load to a reference potential point” as discussed with respect to claim 1 *supra*.

The applied reference also fails to teach or disclose “a common mode choke connected to and between ... the first power converter and ... the second power converter.”

In all illustrated embodiments of *Kanehara*, there is no common mode choke or coils connected between the inverter. Specifically, in FIGs. 1-30 and 34 where the rectifier on the left side of VP/VN might be considered as an inverter, the only element that is connected between the rectifier and the inverter (TR1-TR6) is capacitor 104, rather than a common mode choke. In FIGs. 31-33 and 35, several capacitors are connected between the inverters but no common mode choke is disclosed.

Should the Examiner believe that *Kanehara* includes more relevant teachings in its textual description, the Examiner is requested to furnish an accurate English translation of such teachings.

Until and unless proved otherwise, Applicants respectfully submit that *Kanehara* fails to anticipate the invention of claim 11, as well as the respective dependent claim(s).

As to **independent claim 14**, the applied reference does not fairly teach or disclose “a capacitor and a resistor connected in series between the neutral point of the alternating current load and the reference potential point” as discussed with respect to claim 1 *supra*.

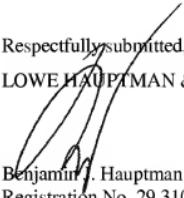
Therefore, Applicants respectfully submit that *Kanehara* fails to anticipate the invention of claim 14, as well as the respective dependent claim(s).

Accordingly, all claims in the present application are now believed in condition for allowance. Early and favorable indication of allowance is courteously solicited.

Applicants note that prosecution of the instant application has been unusually prolonged. The last Final Office Action is the fifth office action in this case, and therefore, it is respectfully requested that the Examiner carefully study the instant application and telephone the undersigned, Applicant's attorney of record, to discuss any issue(s) that might hinder immediate allowance of the present application.

To the extent necessary, a petition for an extension of time under *37 C.F.R. 1.136* is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,
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